

# Monthly MCO Compliance Report

**Medallion 4.0 August 2019 Deliverables**



**Health Care Services Division**

October 28, 2019

# Monthly MCO Compliance Report

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## Medallion 4.0 August 2019 Deliverables

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# Compliance Points Overview

| MCO                  | Prior Month Point Balance | Point(s) Incurred for Current Month* | Point(s) Expiring from August 2018 | Final Point Balance* | Area of Violation: Finding or Concern   |
|----------------------|---------------------------|--------------------------------------|------------------------------------|----------------------|---|
| <u>Aetna</u>         | 4.0                       | 2.0                                  | 0.0                                | 6.0                  | <b>FINDINGS</b><br>Late Submission<br>EI Claim Timeliness<br><b>CONCERNS</b><br>Data Errors |
| <u>Anthem</u>        | 3.0                       | 1.0                                  | 0.0                                | 4.0                  | <b>FINDINGS</b><br>Late Submission<br><b>CONCERNS</b><br>Appeals Issue                      |
| <u>Magellan</u>      | 5.0                       | 1.0                                  | 0.0                                | 6.0                  | <b>FINDINGS</b><br>EI Claim Timeliness<br><b>CONCERNS</b><br>Data Error                     |
| <u>Optima Health</u> | 14.0                      | 1.0                                  | 0.0                                | 15.0                 | <b>FINDINGS</b><br>EI Claim Timeliness<br><b>CONCERNS</b><br>Data Errors                    |
| <u>United</u>        | 6.0                       | 0.0                                  | 0.0                                | 6.0                  | N/A   |
| <u>VA Premier</u>    | 7.0                       | 2.0                                  | 0.0                                | 9.0                  | <b>FINDINGS</b><br>Call Center Stats<br>EI Claim Timeliness                                 |

*\*All listed point infractions are pending until the expiration of the 15 day comment period.*

Notes:

-**Findings**- Area(s) of violation; point(s) issued.

-**Concerns**- Area(s) of concern that could lead to potential findings; **no** points issued.

-**Expired Points**- Compliance points expire 365 days after issuance. Thus, all points issued in August 2018 (Issue date: 9/15/18) are expired as of 9/15/19 and are subtracted from the final point balance.

# Summary

The **Compliance Review Committee (CRC)** met on October 3, 2019 to review deliverables measuring performance for August 2019 as well as other reported program issues. The CRC consists of five managers and supervisors from the Health Care Services division who vote on what, if any, compliance enforcement actions to take in response to identified issues of potential non-compliance.

The CRC voted to issue compliance points to managed care organizations (MCOs) for late submissions of reporting deliverables, untimely payment of early intervention (EI) claims, and failure to meet call center requirements. In addition, some MCOs had issues with resolving member appeals within the proper timeframe and submissions containing data errors.

Each MCO's compliance findings and concerns are further detailed below. Data related to the Health Care Services Division's compliance activities are also included. The Department communicated the findings of its review of August's compliance issues in letters issued to the MCOs on October 9, 2019.

# Aetna Better Health of Virginia

## Findings:

- **Untimely Deliverable Submission:** Aetna failed to timely submit its weekly Enrollment Broker Provider File deliverable as required by Section 1.4.3 of the Medallion 4.0 Deliverables Technical Manual. The report was due September 23, 2019, but was not submitted until September 24, 2019.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Aetna violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. As a result, the CRC voted to assess Aetna a **one (1) point violation** due to its untimely submission of its weekly Enrollment Broker Provider File deliverable.

Aetna has accumulated 6.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Aetna will not be issued financial sanctions for this issue. The CRC voted not to require Aetna to submit a corrective action plan (CAP). **(CES # 2353)**

- **Untimely Payment of EI Claims:** The Department timely received the August 2019 Early Intervention Services Report deliverable from Aetna. Upon review, the Compliance Unit discovered that the report indicated that Aetna failed to adjudicate 1 clean claim for EI services within 14 days of its receipt in August 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Aetna violated the terms of the Medallion 4.0 contract in failing to adjudicate a clean claim for EI services within 14 days of its receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a 1 point penalty. As a

result, the CRC voted to assess Aetna a **one (1) point violation** due to its failure to adjudicate a clean claim within 14 days of its receipt.

Aetna has accumulated 6.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Aetna will not be issued financial sanctions for this issue. The CRC voted not to require Aetna to submit a CAP. **(CES # 2313)**

### **Concerns:**

- **Data Submission Errors:** The Department timely received the August 2019 Appeals & Grievances Summary and FAMIS Appeals & Grievances Summary deliverables from Aetna. Upon review, it was determined that both deliverables contained data errors. Specifically, the Department's subject matter expert determined that both reports failed to include the "MCO Appeals- Open" and "Resolved MCO Appeals" tabs, as required in Sections 1.12.6.2 and 1.12.7.2 of the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Aetna violated the terms of the Medallion 4.0 contract in the deliverable submissions addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. However, the Department's subject matter expert indicated that this was the first instance in which the Department had officially determined Aetna's appeals and grievances reports to be deficient.

The Compliance Team recommended that in response to the issue identified above, Aetna be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2350)**

### **MIP/CAP Update:**

- No updates

### **Appeal Decision:**

- No appeals

### **Expiring Points:**

- No expiring points

### **Financial Sanctions Update:**

- No outstanding sanctions at this time

### **Summary:**

- For deliverables measuring performance for August 2019, Aetna showed a generally high level of compliance. Aetna timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One weekly deliverable was submitted late (addressed above in **CES # 2353**) and another deliverable was submitted with data errors (addressed above in **CES # 2250**). Aetna's member and provider call centers complied with abandonment ratio requirements, and outside of an issue listed above (in **CES # 2313**), Aetna complied with all applicable provider payment timeliness requirements. In summation, Aetna complied with most applicable regulatory and contractual requirements.

# Anthem HealthKeepers Plus

## Findings:

- **Untimely Deliverable Submission:** Anthem failed to timely submit its monthly Foster Care and Adoption Assistance Member Care Coordination Report deliverable as required by Section 1.2.9 of the Medallion 4.0 Deliverables Technical Manual. The report was due September 16, 2019, but was not submitted until September 18, 2019 after prompting from the Compliance Unit.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Anthem violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. As a result, the CRC voted to assess Anthem a **one (1) point violation** due to its untimely submission of its monthly Foster Care and Adoption Assistance Member Care Coordination Report deliverable.

Anthem has accumulated 4.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Anthem will not be issued financial sanctions for this issue. The CRC voted not to require Anthem to submit a CAP. **(CES # 2309)**

## Concerns:

- **Appeals Issue:** On September 4, 2019, a subject matter expert from the Department's Appeals Division informed the Compliance Unit that Anthem had failed to adjudicate an internal appeal within 30 days as required by law and the Medallion 4.0 contract. The subject matter expert provided documentary evidence that Anthem had adjudicated appeal number APP-5401250 in 45 days.

Section 12.3 of the Medallion 4.0 contract and the Code of Federal Regulations at 42 C.F.R. §438.408(b) require the MCOs to adjudicate internal appeals within 30 days of their receipt in the absence of an extension request. The

documentary evidence provided by the Appeals Division's subject matter expert showed that Anthem adjudicated appeal number APP-5401250 45 days after its receipt, and Anthem did not request an extension. Thus, Anthem violated the terms of the Medallion 4.0 contract.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a 1 point penalty. However, the Department's subject matter expert indicated that this was the first instance in which the Department had officially sought to enforce compliance with regards to the timeliness of Anthem's adjudication of internal appeals.

The Compliance Team recommended that in response to the issue identified above, Anthem be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. **(CES # 2330)**

### MIP/CAP Update:

- No updates

### Appeal Decision:

- **CES # 2242:** The Department received the following message from Anthem in regards to **CES # 2242**, a case in which Anthem was issued a one (1) point violation for exceeding the allowable provider call center call abandonment rate:

"Anthem would like first acknowledge the failure to meet the required contractual threshold of 95% as outlined in the Medallion 4.0 contract. As indicated in the letter of noncompliance received from DMAS on September 11, 2019 it is our understanding that these points are pending. Section 10.1.C.b of the Medallion 4.0 contract outlines that the Department ***may consider waiving points for instances when the Contractor identifies and self-reports infractions.*** We would just like to point out for the Compliance Committee's consideration that Anthem self-reported the telephone issue related to this infraction(see the attached email). Since then Anthem has employed the necessary mitigation strategies to ensure our performance standards are met going forward and strongly believe that is reflected in our reporting for the coming month.

While we understand that under the area of the contract cited that waiving points is completely at the discretion of the Department we just wanted to bring this your attention for consideration. Anthem takes very seriously its obligations under our contract and to our members and providers. We are committed to providing high quality service and assuring access to care.

We thank you for your time and consideration.”

Upon reviewing Optima’s statement, the CRC voted to uphold the actions taken in conjunction with **CES # 2242**. The Department sent the following response to Anthem:

“The Health Care Services Compliance Review Committee (CRC) recently met on October 3, 2019. During this meeting, the CRC reviewed Anthem's September 16, 2019 email, sent in response to compliance case ID #2242 (MCO Call Center Statistics abandon rate exceeding allowable threshold).

Anthem's September 16 email requested that the one point penalty associated with compliance case #2242 be rescinded. The email indicated that Anthem self-reported the call center issue to DMAS, and pointed out that section 10.1.C.b of the Medallion 4.0 contract allows compliance points to be waived in response to a self-reported issue. Anthem also attached an email from August 7, 2019, in which Anthem informed DMAS of an issue with Anthem's call center that would potentially affect Anthem's July 2019 call center statistics.

The CRC voted to uphold the one point penalty associated with case #2242. The CRC expressed appreciation for Anthem's willingness to self-report infractions. However, in this case, the CRC noted that Anthem's self-reporting came on August 7, 2019, a date that fell after the July reporting period ended and only eight days before the due date for mandatory reporting of Anthem's call center statistics. The CRC found that Anthem's self-reporting of the provider call center deficiency at issue in case #2242 was commendable, but did not warrant the waiver of a compliance point based on its timing. The CRC thus voted to uphold the compliance point issued in response to case #2242.”

### **Expiring Points:**

- No expiring points

### **Financial Sanctions Update:**

- No outstanding sanctions at this time

### **Summary:**

- For deliverables measuring performance for August 2019, Anthem showed a generally high level of compliance. Anthem timely submitted 22 of 23

required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. One monthly deliverable was submitted late (addressed above in **CES # 2309**). Anthem's member and provider call centers complied with abandonment ratio requirements, and Anthem complied with all applicable provider payment timeliness requirements. Anthem failed to timely adjudicate an internal appeal (addressed above in **CES # 2330**). In summation, Anthem complied with most applicable regulatory and contractual requirements.

# Magellan Complete Care

## Findings:

- **Untimely Payment of EI Claims:** The Department timely received the August 2019 Early Intervention Services Report deliverable from Magellan. Upon review, the Compliance Unit discovered that the report indicated that Magellan failed to adjudicate 2 clean claims for EI services within 14 days of their receipt in August 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Magellan violated the terms of the Medallion 4.0 contract in failing to adjudicate clean claims for EI services within 14 days of their receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a 1 point penalty. As a result, the CRC voted to assess Magellan **a one (1) point violation** due to its failure to adjudicate clean claims within 14 days of their receipt.

Magellan has accumulated 6.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Magellan will not be issued financial sanctions for this issue. The CRC voted not to require Magellan to submit a CAP. **(CES # 2312)**

## Concerns:

- **Data Submission Error:** The Department timely received the August 2019 ARTS Appeals & Grievances Summary deliverable from Magellan. Upon review, it was determined that the deliverable contained data errors. Specifically, the Department's subject matter expert determined that the report was missing the row of data corresponding to provider appeals, as required in Section 1.2.2.2 of the ARTS Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Magellan violated the terms of the Medallion 4.0 contract in the deliverable submission addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. However, the Department's subject matter expert indicated that this was the first instance in which the Department had officially determined Magellan's ARTS appeals and grievances report to be deficient.

The Compliance Team recommended that in response to the issue identified above, Magellan be issued a **Notice of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue a **NONC without associated compliance points or financial sanctions** in response to this issue. (CES # 2352)

### MIP/CAP Update:

- No updates

### Appeal Decision:

- No appeals

### Expiring Points:

- No expiring points

### Financial Sanctions Update:

- No outstanding sanctions at this time

### Summary:

- For deliverables measuring performance in August 2019, Magellan showed a generally high level of compliance. Magellan timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. Magellan submitted a deliverable with reporting errors (addressed above in **CES # 2352**). Magellan's member and provider call centers complied with abandonment ratio requirements, and outside of an issue listed above (in **CES # 2312**), Magellan complied with all applicable provider payment timeliness requirements. In summation, Magellan complied with most regulatory and contractual requirements.

# Optima Health

## Findings:

- **Untimely Payment of EI Claims:** The Department timely received the August 2019 Early Intervention Services Report deliverable from Optima. Upon review, the Compliance Unit discovered that the report indicated that Optima failed to adjudicate 33 clean claims for EI services within 14 days of their receipt in August 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Optima violated the terms of the Medallion 4.0 contract in failing to adjudicate clean claims for EI services within 14 days of their receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a 1 point penalty. As a result, the CRC voted to assess Optima a **one (1) point violation** due to its failure to adjudicate clean claims within 14 days of their receipt.

Optima has accumulated 15.0 points, placing it in Level 2 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, the Compliance Deficiency Identification System requires a plan in Level 2 to be issued a financial sanction in the amount of \$5,000 for each compliance enforcement action taken. As a result, Optima will be assessed a **\$5,000 financial sanction** for its failure to adjudicate EI clean claims within 14 days of their receipt. The CRC voted not to require Optima to submit a CAP. **(CES # 2311)**

## Concerns:

- **Data Submission Errors:** Optima timely submitted the August 2019 monthly ARTS Service Authorizations and Registrations Report deliverable and the weekly Pharmacy Prior Authorizations - NCPDP Transfer Standard Report deliverable for the week beginning September 16, 2019. Upon review, it was determined that both deliverables contained data errors. Specifically, the Department's subject matter expert determined that the August 2019 monthly ARTS Service Authorizations and Registrations Report deliverable contained a field with values outside of the values allowed under Section 1.2.3.2 of the ARTS Technical Manual. The Department's subject matter expert also found that the Pharmacy Prior Authorizations - NCPDP Transfer Standard Report deliverable at issue contained values that did not correspond to the Medallion

4.0 program, in violation of Section 1.8.46 of the Medallion 4.0 Deliverables Technical Manual.

Section 10.1.E.d.b of the Medallion 4.0 contract requires the MCOs to submit reporting deliverables timely, with accurate data, and in the format and layout specified by DMAS. Thus, Optima violated the terms of the Medallion 4.0 contract in the deliverable submissions addressed above.

According to Section 10.1.E.a of the Medallion 4.0 contract, failures to comply with the contract that "[i]mpair[] the Department's ability to properly oversee and/or analyze Contractor performance, including but not limited to reporting errors" are subject to a 1 point penalty. However, the Department's subject matter experts indicated that Optima's data errors were very minor and did not impair the Department's ability to properly oversee Optima's performance in this instance.

The Compliance Team recommended that in response to the issues identified above, Optima be issued two **Notices of Non-Compliance (NONC)** without any associated compliance points, financial sanctions, or corrective actions. The CRC agreed with the Compliance Team's recommendation, and voted to issue two **NONCs without associated compliance points or financial sanctions** in response to these issues. **(CES # 2329 & 2351)**

### **MIP/CAP Update:**

- No updates

### **Appeal Decision:**

- No appeals

### **Expiring Points:**

- No expiring points

### **Financial Sanctions Update:**

**The following financial sanctions will be sent to DMAS' Fiscal Division for enforcement:**

- July 2019 Data Submission Error - \$5,000 **(CES # 2243)**

### **Summary:**

- For deliverables measuring performance for August 2019, Optima showed a generally high level of compliance. Optima timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. Two deliverables contained reporting errors (addressed above in **CES # 2329 & 2351**). Optima's member and provider call centers complied with abandonment ratio requirements, and outside of an

issue listed above (in **CES # 2311**), Optima complied with all applicable provider payment timeliness requirements. In summation, Optima complied with almost every regulatory and contractual requirement.

# UnitedHealthcare

## **Findings:**

- No findings (*i.e.*, no compliance issues severe enough to necessitate the issuance of compliance points)

## **Concerns:**

- No concerns

## **MIP/CAP Update:**

- No updates

## **Appeal Decision:**

- No appeals

## **Expiring Points:**

- No expiring points

## **Financial Sanctions Update:**

- No outstanding sanctions at this time

## **Summary:**

- For deliverables measuring performance for August 2019, United showed an outstanding level of compliance. United timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. United's member and provider call centers complied with abandonment ratio requirements, and United complied with all applicable provider payment timeliness requirements. In summation, United was a top performer in August 2019, and complied with every regulatory and contractual requirement.

# Virginia Premier

## Findings:

- **Call Center Statistics:** Based on Virginia Premier's August 2019 MCO Call Center Statistics deliverable, Virginia Premier answered 93.61% of incoming provider calls in the month of August 2019. Per Section 5.4.A of the Medallion 4.0 contract, in order to be compliant, Virginia Premier was required to answer at least 95% of incoming provider calls. Virginia Premier failed to answer enough incoming provider calls to be in compliance in August 2019.

According to Section 10.1.E.b of the Medallion 4.0 contract, failures to comply with the contract that "represent[] a threat to [the] smooth and efficient operation" of the Medallion 4.0 program are subject to a 1 point penalty. As a result, the CRC voted to assess Virginia Premier **a one (1) point violation** for its failure to answer at least 95% of incoming calls to its provider call center.

Virginia Premier has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Virginia Premier will not be issued financial sanctions for this issue. The CRC voted not to require Virginia Premier to submit a CAP. **(CES # 2314)**

- **Untimely Payment of EI Claims:** The Department timely received the August 2019 Early Intervention Services Report deliverable from Virginia Premier. Upon review, the Compliance Unit discovered that the report indicated that Virginia Premier failed to adjudicate 78 clean claims for EI services within 14 days of their receipt in August 2019.

Section 5.5 of the Medallion 4.0 contract requires the MCOs to adjudicate all clean claims for EI services within 14 days of their receipt. Thus, Virginia Premier violated the terms of the Medallion 4.0 contract in failing to adjudicate clean claims for EI services within 14 days of their receipt.

According to Section 10.1.E.a of the Medallion 4.0 contract, a failure to comply with the contract that "represents a threat to [the] smooth and efficient operation" of the Medallion 4.0 program is subject to a 1 point penalty. As a result, the CRC voted to assess Virginia Premier **a one (1) point violation** due to its failure to adjudicate clean claims within 14 days of their receipt.

Virginia Premier has accumulated 9.0 points, placing it in Level 1 on the Compliance Deficiency Identification System. As described in 10.1.D of the

Medallion 4.0 contract, an MCO in Level 1 of the Compliance Deficiency Identification System is not subject to financial sanctions. As a result, Virginia Premier will not be issued financial sanctions for this issue. The CRC voted not to require Virginia Premier to submit a CAP. **(CES # 2310)**

### **Concerns:**

- No concerns

### **MIP/CAP Update:**

- No updates

### **Appeal Decision:**

- No appeals

### **Expiring Points:**

- No expiring points

### **Financial Sanctions Update:**

- No outstanding sanctions at this time

### **Summary:**

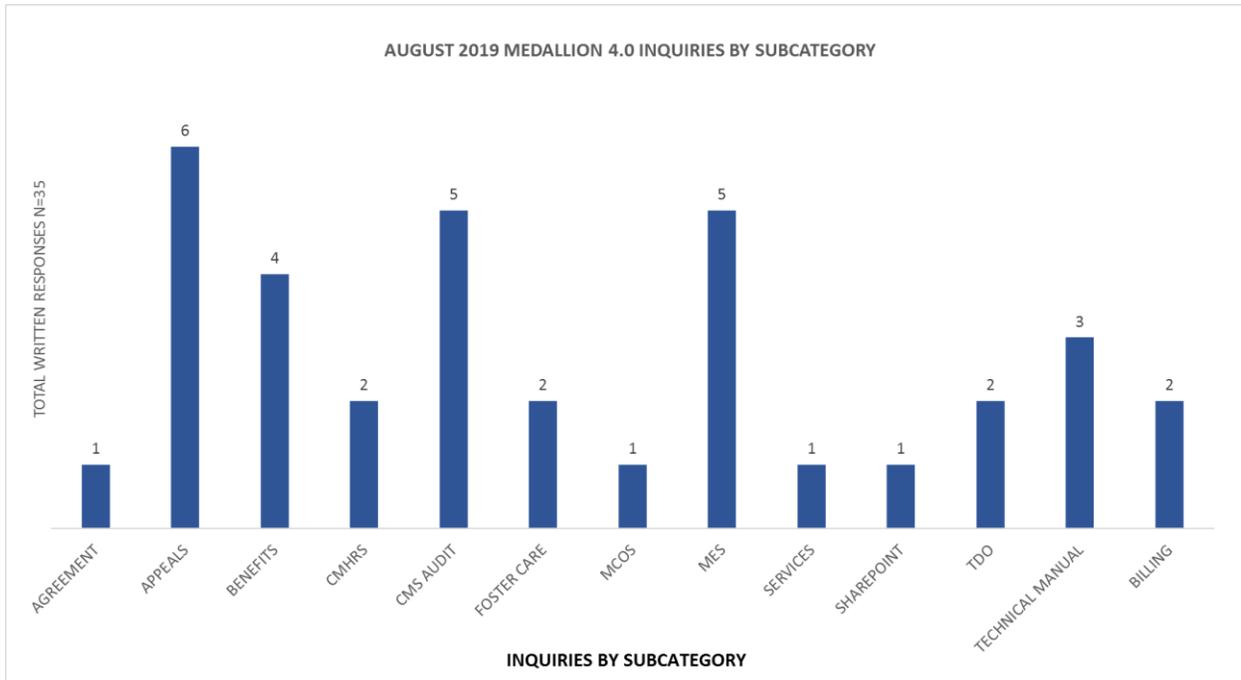
- For deliverables measuring performance in August 2019, Virginia Premier showed a generally high level of compliance. Virginia Premier timely submitted all 23 required monthly reporting deliverables, and those deliverables did not expose any programmatic issues. Virginia Premier's member call centers complied with abandonment ratio requirements, but its provider call center did not meet the required answer/abandon rate (addressed above in **CES # 2314**). Outside of an issue listed above (in **CES # 2310**), Virginia Premier complied with all applicable provider payment timeliness requirements. In summation, Virginia Premier complied with most regulatory and contractual requirements.

# Compliance Activity Data

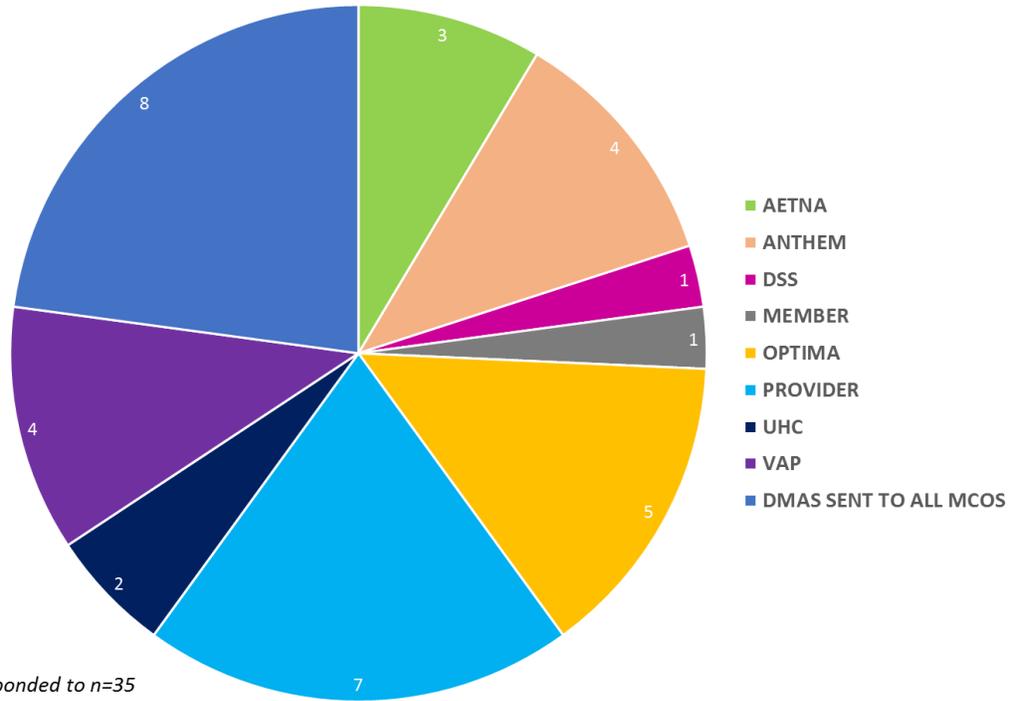
## August 2019 – Member and Provider Solutions Unit

|   |    |
|---|----|
| Member Inquiries <i>Received</i>                  | 13 |
| Provider Inquiries <i>Received</i>                | 36 |
| MCO Inquiries <i>Received</i>                     | 26 |
| Constituent Concerns<br>("Pinks") <i>Received</i> | 15 |
| Marketing Materials <i>Reviewed</i>               | 57 |
| Other Inquiries <i>Received</i>                   | 43 |

### MEDALLION 4.0 MAILBOX MONITORING



AUGUST 2019 MEDALLION 4.0 INQUIRIES BY PROVIDERS, STAKEHOLDERS & MCO



## PROVIDER FRAUD ACTIVITY THROUGH AUGUST

| PROVIDER FRAUD ACTIVITY REFERRED TO MCOS |            |              |
|--|------------|--------------|
| Description                              | Open Cases | Closed Cases |
| GOOD CAUSE REFFERALS                     |            | 15           |
| PAYMENT SUSPENSIONS                      |            | 15           |
| INFORMATION REFEERAL TO MCO              |            | 7            |
| ENDING PAYMENT SUSPENSIONS               |            | 9            |
| MFCU INVESTIGATIONS                      |            | 25           |
| PROVIDER TERMINATIONS                    |            | 30           |
| PROVIDER TERMINATIONS (OTHER)            |            | 6            |
| <b>TOTAL</b>                             | <b>0</b>   | <b>107</b>   |

## MEDALLION NEWBORN RECONCILIATION OVERSIGHT

| MCO MED3   | 2017_05 | 2017_06 | 2017_07 | 2017_08 | 2017_09 | 2017_10 | 2017_11 | 2017_12 | 2018_01 | 2018_02 | 2018_03 | 2018_04 | 2018_05 | 2018_06 | 2018_07 | 2018_08 | 2018_09 |
|------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Anthem     | F       | F       | F       | F       | F       | C       | F       | F       | F       | C       | C       | S       | C       | S       | S       | S       | S       |
| Aetna      | F       | F       | F       | F       | F       | F       | F       | F       | F       | C       | C       | C       | F       | C       | C       | C       | S       |
| INTotal    | F       | F       | C       | F       | F       | F       | F       | F       | F       | F       | F       | C       | C       | C       | S       | S       | S       |
| Kaiser     | F       | F       | F       | F       | F       | F       | F       | F       | F       | F       | F       | C       | F       | F       | C       | S       | S       |
| Optima     | F       | F       | F       | F       | F       | F       | F       | F       | F       | F       | F       | C       | S       | S       | S       | S       | S       |
| VA Premier | F       | C       | C       | F       | F       | F       | F       | F       | F       | C       | F       | C       | C       | S       | S       | S       | S       |

**S** - Recon request file has been submitted to DMAS and is being processed for reconciliation payment.

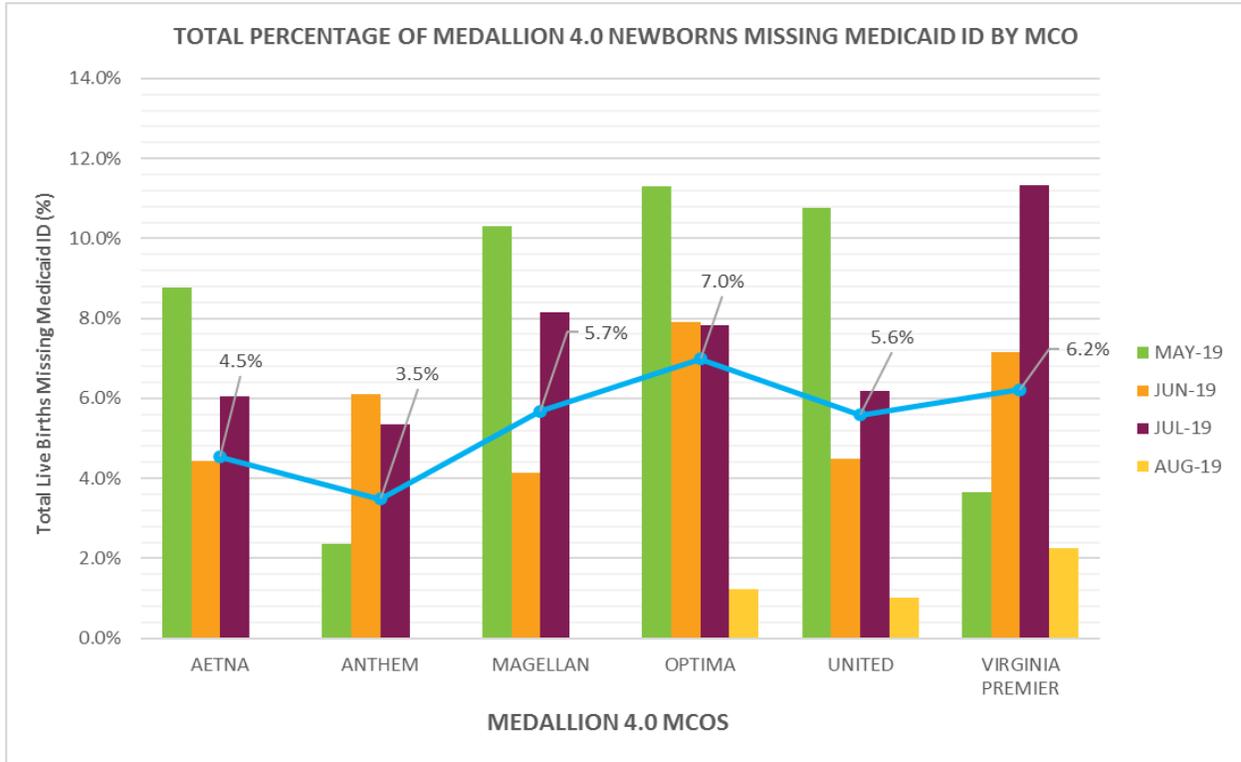
**C** - Waiting for MCO to approve Provider Payment Agreement in order to make final reconciliation payment and close the period.

**F** - Closed. All newborn processing is complete for the MCO for the period.

## MEDALLION MAGELLAN BHSА CMHRS CLAIMS MONITORING

| Reporting Month                    | Amount       | Status | Retraction   | Date Completed   |
|------------------------------------|--------------|--------|--------------|--|
| SEPTEMBER                          | \$7,303.84   | CLOSED | \$7,303.84   | 10/10/2018   |
| OCTOBER                            | \$20,020.71  | CLOSED | \$20,020.71  | 1/4/2019   |
| NOVEMBER                           | \$198,261.12 | CLOSED | \$119,047.14 | 3/29/2019  |
| DECEMBER                           | \$13,432.02  | OPEN   | \$10,581.88  | 10/18/19: Pending additional <span style="color: red;">\$1,755.80</span> |
| JANUARY                            | \$6,396.68   | OPEN   | \$6,396.68   | Pending  |
| FEBRUARY                           | \$1,035.73   | OPEN   | \$596.16     | Pending  |
| MARCH                              | \$3,030.12   | OPEN   | \$2,668.41   | Pending  |
| APRIL                              | \$5,329.28   | OPEN   | \$1,035.24   | Pending  |
| MAY                                | \$0.00       | CLOSED | \$0.00       | NA   |
| JUNE                               | \$291.48     | OPEN   | \$291.48     | Pending  |
| <b>Retraction Due</b>              |              |        |              | \$12,743.77  |
| <b>Actual Retraction Completed</b> |              |        |              | \$156,953.57   |

## MEDALLION 4.0 LIVE BIRTHS OVERSIGHT



## MEDALLION 4.0 MCO PROVIDER CONTRACT REVIEWS AUGUST

| Sub_Dt_MCO | Name     | Submission_of                                     | DMAS_Comp | DMAS_Decision_1 | MCO_Edits_Due | MCO_Comp_Days | DMAS_Decision_2 | MCO_Edits_Due | MCO_Comp_Days | DMAS_Ap_Dt | Final_Status |
|------------|----------|---|-----------|-----------------|---------------|---------------|-----------------|---------------|---------------|------------|--------------|
| 6/27/2019  | United   | Accountable Care Organization (ACO) Agreement     | 29        | Resubmission    | 9/24/2019     | 54            | Resubmission    | 11/8/2019     | Pending MCO   |            |              |
| 8/22/2019  | United   | NPO Participation Agreement - Regulatory Appendix | 4         | Resubmission    | 10/25/2019    | Pending MCO   |                 |               |               |            |              |
| 8/19/2019  | Magellan | Magellan Healthcare, Inc. PCP Agreement Template  | 21        | Resubmission    | 11/8/2019     | 2             | Approved        | NA            | NA            | 9/20/2019  | Approved     |

## MEDALLION 4.0 MEMBER LETTERS DASHBOARD – AUGUST

| MEDALLION 4.0 LETTERS DASHBOARD - AUG 2019  |               |           |                    |
|---|---------------|-----------|--------------------|
|   | Date Approved | Date Sent | Total Letters Sent |
| Medallion 4.0 Assignment                    | 8/20/2019     | 8/22/2019 | 6,706              |
| Medallion 4.0 MedEx Assignment              | 8/20/2019     | 8/22/2019 | 11,598             |
| Medallion 4.0 Re-Enrollment                 | 8/20/2019     | 8/22/2019 | 1,877              |
| Medallion 4.0 MedEx Re-Enrollment           | 8/20/2019     | 8/22/2019 | 1,041              |
| Medallion 4.0 Change                        | NA            | NA        | 0                  |
| Medallion 4.0 MedEx Change                  | NA            | NA        | 0                  |
| Medallion 4.0 Maternal Child Health Letters | 8/20/2019     | 8/22/2019 | 1,453              |
| <b>Total Letters Sent</b>                   |               |           | <b>22,675</b>      |

# Next Steps

At this time, the Compliance Unit is continuing monthly Compliance Review Committee meetings, following up on reoccurring issues, and communicating with the MCOs regarding identified issues. The Compliance Unit is in the process of expanding the types of compliance issues it investigates, and involving itself with programmatic issues as well as technical deliverable issues.

The Compliance Unit is expanding the amount of face-to-face contact it has with MCO compliance personnel, and has recently held its first round of monthly MCO compliance calls.

The Compliance Unit is also responsible for generating and maintaining policies and procedures for the Health Care Services Division. The Compliance Unit has generated six policy and procedure documents to date, and the long-term project to create policies and procedures is ongoing.